



Final Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Optimum Coal Mine (Pty) Ltd
Private Bag X1201
Pullenshope
1096

POPOSED KWAGGA NORTH PROJECT ON PORTIONS OF THE FARMS KOPERMYN 435 JS, MOOIFONTEIN 448 JS, TWEEFONTEIN 458 JS, BOSMANSPRUIT 459 JS AND KWAGGAFONTEIN 460 JS, ARNOT, MPUMALANGA.

Fourie, W. (September 2012). Follow-Up Evaluation as required by HIA Compiled for Optimum Colliery – Kwagga North Project, Mpumalanga

Groenewald, G. July 2013. Palaeontological Desktop Assessment for the Kwagga North Project: An extension of the Optimum Colliery near the town of Arnot, Steve Tshwete Local Municipality, Nkangala District Municipality, Mpumalanga

Thank you for the above additional information submitted to SAHRA in May and July 2013. The above submitted studies satisfy SAHRA's requirements.

The above heritage report identified a cluster of approximately 12 Ndebele homesteads in the study area. Ndebele Highveld architecture developed a distinct identity that dates back to the 1890's. According to the report, clusters of this size are becoming increasingly rare on Highveld farms. This decline is attributed to escalating costs of material and paint as well as to urbanisation.

A great majority of the walls of the Ndebele structures are painted in monochromatic light blue or turquoise, some are in earthen colours and some are not even painted. Very few have the distinct geometric patterns of the Ndebele. Most of the structures have corrugated roof sheeting as grass thatching has become too labour intensive. Based on this information, the identified resource seems to be less significant than originally proposed.

The above heritage report also investigated the intangible heritage associated with the identified homesteads. The findings of the report were that the local headman supervises the quadrennial male initiation rituals - the next of which is proposed for April to July 2013. As such, the intended relocation of the community will have a significant impact on this ritual.

According to the above palaeontological report, the study area is underlain by sedimentary rocks of the Vryheid Formation of the Ecca Group as well as volcanic rocks of the Damwal Formation. The Damwal Formation is unlikely to contain significant fossil material, however the Vryheid Formation is known for its significant plant fossils as well as invertebrate trace fossils. This fossil material may be impacted by mining





however, mining may also expose significant material that may otherwise never be identified.

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Based on the information contained in the above reports, as well as the report dated October 2009, SAHRA requires that;

- The identified Ndebele homesteads are significant in terms of local heritage only and are thus assigned low heritage significance. No further mitigation is required in terms of these resources.
- All identified cemeteries and grave sites must be fenced and have a 10m buffer zone of no impact. A Conservation Management Plan must be drafted and included in the EMP for the continued management and conservation of these cemeteries and graves.
- The structure identified in the 2009 report as Site 26 must not be impacted by the proposed mining activities without the consent of the owner and a permit from the Mpumalanga Provincial Heritage Resources Authority (Mr B. Moduka: bmoduka@mpg.gov.za or 013 766 5198).
- Due to the likelihood of the proposed mining impacting on significant fossil material, a protocol and procedure regarding the required actions when finding fossils must be included in the EMP for the mine. This "Fossil Finds Procedure" should indicate that SAHRA must be contacted when significant fossil material is identified.
- Should any evidence of archaeological sites or remains (e.g., remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, marine shell and charcoal/ash concentrations), unmarked human burials, fossils or other categories of heritage resources are found during the proposed activities, SAHRA APM Unit (Jenna Lavin/Colette Scheermeyer 021 462 4502) must be alerted immediately, and a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contacted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation might be necessary.

Should it not be possible to adhere to the above conditions, the applicant must consult with SAHRA regarding the reasons for non-compliance. In this instance, on SAHRA's advice, other mitigation strategies may have to be adopted which will require following a process for archaeological or palaeontological investigation in terms of Section 35 and for exhumation in terms of Section 36 of the NHRA (Act 25 of 1999).

It must be noted that should any of the structures identified in the report require alteration or demolition, a permit must first be granted for this work by the Mpumalanga Provincial Heritage Resources Authority (Mr B. Moduka: bmoduka@mpg.gov.za or 013 766 5198) in terms of Section 34 of the NHRA (Act 25 of 1999).

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully





Jenna Lavin
Heritage Officer
South African Heritage Resources Agency

Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/114746>

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.



The South African Heritage Resources Agency

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